

Federal Communications Commission
Wireless Telecommunications Bureau
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Received & Inspected

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FCC Mailroom

Commissioner Wireless Telecommunications Bureau;

It has come to my attention that because of changes to the base document ITU-R M.493-xx over the many years since the Icom IC M802 High Frequency Single Side Band (HF SSB) transceiver was type accepted by the FCC, The FCC has now stopped the sale of the transceiver in the United States.

Our main cruisers lifeline to the rest of the world was the IC M802. Over 70% of cruisers equip their vessels with an IC M802s for primarily safety at sea. Cruisers use the IC M802 DSC functions to contact other vessels. Should an emergency situation arise on board, the IC M802 is the cruisers primary link into the Global Maritime Distress and Safety System (GMDSS).

HF SSB voice operation is often noisy and can provide marginal communications. Utilizing the DSC functions, cruisers are able to obtain improved connectivity with other cruisers, positions of other cruisers, as well as the GMDSS functions for distress, urgent and safety calling. The IC M802 is also key for cruisers to stay in touch using HF SSB email systems as well as receiving weather updates to further enhance cruising safety during transits.

Some cruising captains and retired naval officers have played an active role to make sure other cruisers understand the power of Marine VHF and HF SSB DSC. Cruisers need DSC and the link into GMDSS. One captain I know studied for and obtained a GMDSS Maintainers License a couple of years ago to complement his Commercial License with Radar endorsement. The main purpose of attaining the GMDSS license was to enhance knowledge of the GMDSS in order to pass along to other cruisers. Many yachting people wanted to understand how cruisers could utilize the GMDSS when in trouble and potentially save lives. With the cooperation of many countries, they created the Worldwide Group number system to aid cruisers getting help via DSC for non-safety related issues.

Other notable DSC activity includes the ITU subcommittee in Turkey (Document 5B/ 16 October 2014) which ultimately adopted my approach for DSC watch scanning frequencies to expand DSC calling. The approach was recommended by the subcommittee to the ITU and is expected to be in the next re-write of applicable documents. The standardized scanning frequency approach will further enhance the safety of life at sea for all vessels including cruisers, if an HF DSC radio is available in

the US market. The standard has already been adopted by racing committees and cruisers around the world.

The IC M802 is the only affordable long-range connection to the GMDSS for cruisers. Over several years cruisers have received many DSC distress calls from cruisers and other vessels.

Stopping the sales of the IC M802 in the United States has resulted in cruisers starting to install illegally modified non-DSC Amateur radios. The Amateur radios are being modified to allow coverage of marine HF SSB frequencies. Amateur radios are typically more difficult to operate than the IC M802. As a result, there is a high potential for operational issues during an emergency.

Using Amateur radios further more does not include DSC functionality which eliminates their link into the GMDSS.

Based on research, the United States is the only country that has restricted sales of the IC M802. Preventing United States cruisers from outfitting their vessels with DSC capable HF SSB radios will eventually result in loss of life and is not consistent with the Safety of Life at Sea (SOLAS) focus to keep vessels at sea safe.

Our recommendation is to allow Icom America to continue selling the IC M802 until a replacement radio is available that meets the new standards. The FCC could instruct ICOM America to add a printed, non-removable label attached to the outside top of the transceiver identifying that the IC M802 is not in compliance with the newest ITU standard. The label could list where the IC M802 does not comply. The label could also identify that the IC M802 is now intended for pleasure vessel use only. However, I see significant advantage for small commercial vessels as well.

Looking forward to your attention,

Gene Gammon

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